

## NOTICE OF SETTLEMENT OF CLASS ACTION

If you are African American, and if you worked for Up-To-Date Laundry in a non-management position at any time between August 1, 1998 and January 23, 2004, you may be eligible to participate in the settlement of a class action. The class action is known as *Newsome v. Up-To-Date Laundry*, No. S01-2257 (WDQ). It is pending in United States District Court in Baltimore before Judge William D. Quarles.

You may be entitled to participate in the settlement fund of \$1,830,000, which Up-To-Date Laundry (UTDL) and the other defendants have agreed to establish. Before any money is distributed, however, the settlement must first be approved by the Court, and you may have the right to comment or object before the Court acts. In this regard, Judge Quarles has scheduled a Fairness Hearing on \_\_\_\_\_, 2004 at \_\_\_\_\_ in Courtroom \_\_\_ in the United States Courthouse at 101 W. Lombard Street in Baltimore. If you wish to comment, you must notify the Court by \_\_\_\_\_, 2004 [90 days of the date of preliminary approval].

In addition, you **must** submit a Claim Form to be entitled to receive any of the settlement money. On the other hand, if you do not wish to participate in the settlement, you have a right to opt out by submitting an Opt Out Form. These forms must be returned by \_\_\_\_\_, 2004 [90 days of the date of preliminary approval].

If you are not sure if you are eligible, or if you have other questions, please call the following toll free number: (866) 854-5148.

## BACKGROUND

*Newsome* was originally filed in United States District Court in Baltimore in August 2001 by five former African-American hourly workers at UTDL. They charged that UTDL and the other defendants discriminated against black workers in terms of pay, overtime opportunity and job assignment. They also said that UTDL and the other defendants maintained a hostile work environment based on race. All defendants denied these charges.

In January 2004, Judge Quarles ruled that the case could go forward as a class action. Shortly after that, the five former employees who brought the case, along with their lawyers, began settlement discussions with UTDL and the other defendants. After much bargaining, the negotiations resulted in a proposed settlement agreement. By agreeing to settle, the defendants are not admitting any wrongdoing.

In brief, the settlement includes both money and certain non-monetary requirements that UTDL and the other defendants must abide by. In particular, UTDL and the other defendants will not (1) discriminate against African-American employees based on race, including but not limited to the payment of base wages, assignment of overtime work, and assignment to the Soil Room, (2) engage in harassment or other demeaning or offensive conduct based on race, including but not limited to the use of

racial slurs, epithets or stereotypes, or (3) retaliate against African-American employees for opposing discrimination and/or harassment.

The settlement also provides a formula for allocating money from the settlement fund of \$1,830,000. Once again, you **must** submit a Claim Form to be entitled to receive any of the settlement money. So, if you believe you may be eligible, because you are an African American who worked in a non-management position for UTDL at any time between August 1, 1998 and January 23, 2004, you should call the toll free number and get the necessary forms.